

Newark

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August 30, 2021

Via ECF

Hon. Michael A. Hammer, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King Jr. Federal Building and Court House
Newark, New Jersey 07102

Re: Lee Evans v. City of Newark et al.
CIVIL ACTION NO. 14-cv-120 (KM-MAH)

City of Newark defendants' letter update on 30(b)6 depositions [D.E. 207]

Dear Judge Hammer:

Your Honor asked for an update by today on the scheduling of the City of Newark designee depositions. I am writing asking Your Honor for some additional time.

I have identified several responsive witnesses. One is on vacation, and the other no longer works for the City, but because of the older time frames addressed in the notice, he may be most able to testify on the topics. I am working to ascertain his availability.

I am hoping to have dates by the end of this week (September 3, 2021). Mr. Vomacka and Mr. Kassis have no objection to this short extension. I have not heard from Ms. Bonjean yet, but in all fairness, I only advised all counsel that I was going to write to Your Honor a few hours ago.

Respectfully, I am asking for an extension until September 3, 2021 to get these depositions scheduled.

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Respectfully,

Kenyatta Stewart
Corporation Counsel

By: /s/ Gary S. Lipshutz
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/GSL